UNITED STATES ENVIRONMENTAL PROTECTION AGENCY **REGION 2**

DATE: April 3, 2003

SUBJECT: Review of the Health and Safety Plan -for the Diamond Head Oil Superfund Site RI/FS

Kearny, Hudson County, New Jersey

FROM: Michael Matarazzo, CIH - Industrial Hygienist 2n Industrial Branch

To: Grisell Diaz-Cotto, Remedial Project Manager ERRD/New Jersey Remediation Branch

As requested, I have reviewed the Health and Safety Plan, for the above referenced site. I have found this document to meet the minimum requirements for a project of this scope, although all pertinent aspects of the HASP were not in a single section, but rather scattered throughout the QAPP/Sampling Plan. I offer a few comments.

- 1. Page 1 Section 1.1.2 Non Hazwoper Regulated Tasks Grubbing and Clearing is listed as non regulated. Shouldn't this be a regulated task?
- 2. Page 4 Section 2.1.1 Project Specific Hazards Drilling There is a statement, "Stay clear of areas surrounding drill rigs." A safe distance should be specified. I recommend 20'.
- 3. Page 4 Section 2.1.2 Excavations

The soil in this area will likely be unstable and there should be a statement regarding shoring for trenches of 4 feet or greater when entry is required.

4. Page 14. Table - Contaminants of Concern

Benzene. The location is listed as SS. In footnote a, there is no SS listed. The Exposure Limit is listed as 1 ppm. The current TLV is 0.5 ppm. Is it the philosophy to choose the lowest of the published values for PELs, TLVs or RELs? If so, 0.5 ppm should be the listed Exposure Limit.

Thank you for providing me with the opportunity to review this HASP. I hope that you find my comments useful. If you have any questions, or require clarification regarding any issue, please telephone me at (732) 321-4340.